

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MICHAEL CARTER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

UNITED DEVELOPMENT FUNDING IV,
HOLLIS M. GREENLAW, and CARA D.
OBERT,

Defendants.

Case No. 3:15-cv-4030-C

THE CHARLES G. AND ROSE M.
FAIRBANKS LIVING TRUST,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

UNITED DEVELOPMENT FUNDING IV,
HOLLIS M. GREENLAW, and CARA D.
OBERT,

Defendants.

Case No. 3:15-cv-04055-C

James and Jennifer Anderson, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

United Development Funding IV, Hollis M.
Greenlaw, and Cara D. Obert,

Defendants.

Case No. 3:16-cv-00456-M

Oral Argument Requested

**MOTION OF DAN SCHON AND BRIAN THOMAS FOR
APPOINTMENT AS CO-LEAD PLAINTIFFS,
APPROVAL OF THEIR SELECTION OF LEAD AND
LIAISON COUNSEL AND CONSOLIDATION OF RELATED CASES**

Movants Dan Schon and Brian Thomas, through their undersigned counsel, hereby moves this Court for an Order:

1. Appointing Movants as Co-Lead Plaintiffs in the above-captioned action;
2. Appointing the law firm Block & Leviton LLP as Lead Counsel;
3. Appointing the law firm The Briscoe Law Firm, PLLC as Liaison Counsel; and
4. Consolidating the above captioned related cases.

This Motion is supported by the accompanying Memorandum of Law, Declaration of Willie C. Briscoe and the exhibits attached thereto, the Joint Declaration of Dan Schon and Brian Thomas, a proposed Order, and all of the prior pleadings and proceedings had herein, and such other written and/or oral argument as may be presented to the Court.

Dated: February 19, 2016

Respectfully submitted,

/s/ Willie C. Briscoe

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Proposed Liaison Counsel for the Class

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Proposed Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record through the CM/ECF system for the United States District Court for the Northern District of Texas. All counsel not enrolled to receive electronic notice will be served by regular U.S. Mail.

/s/ Willie C. Briscoe

WILLIE C. BRISCOE